

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

The Staff of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant,	)	
	)	Case No. WC-2008-0126
v.	)	
	)	
Delmic, Inc., Delbert C. Jacobs, and Michelle Fanning-Jacobs,	)	
	)	
Respondents.	)	
	)	
The Staff of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant,	)	
	)	Case No. WC-2008-0079
v.	)	
	)	
Universal Utilities, Inc., and Nancy Carol Croasdell,	)	
	)	
Respondents.	)	

**MOTION TO CONSOLIDATE CASES**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its Motion to Consolidate Cases pursuant to Commission Rule 4 CSR 240-2.110(3) respectfully states as follows:

1. On September 13, 2007, Staff filed its Complaint against Universal Utilities, Inc. (Universal) and its President, Secretary, and Treasurer Nancy Carol Croasdell. (Case No. WC-2008-0079).
2. On October 24, 2007, Staff filed its amended complaint in this matter.

3. This case and Case No. WC-2008-0079 involve related questions of law and fact and should be consolidated to avoid unnecessary costs or delay and to preclude the possibility of inconsistent results.

**WHEREFORE**, Staff requests that the Commission consolidate this case into Case No. WC-2008-0079 and designate WC-2008-0079 as the lead case and the case number under which future filings in both cases will be made.

Respectfully Submitted,

**/s/ Steven C. Reed**

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#### **Certificate of Service**

**I hereby certify that a true and accurate copy of the foregoing was mailed, via first-class mail, postage prepaid, or hand-delivered, or sent via electronic mail to all parties to this matter, on this 25<sup>th</sup> day of October, 2007.**

**/s/ Jennifer Heintz**  
**Jennifer Heintz**